

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	Case No. 09-39313
et al.	§	
	§	Jointly Administered
Debtors.	§	Chapter 11

**TRUSTEE'S OBJECTION TO APPLICATION OF GREENBERG TRAURIG, LLP FOR
ALLOWANCE OF SUBSTANTIAL CONTRIBUTION CLAIM
(Relates to Dkt. No. 586)**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

The Liquidating Trustee, on behalf of the Deep Marine Liquidating Trust as successor to the above named Debtors (the "Trustee"), by and through its undersigned attorneys, hereby files this Objection to the Application of Greenberg Traurig, LLP for Allowance of Substantial Contribution Claim Pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 503(b)(3)(D) and Fed. R. Bankr. P. 2016 (the "Application"), and in support thereof, respectfully represent as follows:

1. The Trustee does not believe that all of the fees and expenses requested by Greenberg Traurig, LLP ("Greenberg") in the Application provided a benefit to the estate. Therefore, to the extent that Greenberg seeks full payment of the fees and expenses requested in the Application, the Trustee objects.

2. The Trustee is in the process of investigating the "benefits conferred upon the estate," if any, that flowed from the actions of Greenberg in order to determine which of the fees and expenses requested in Application may be compensable under section 503.. *Hall Fin. Group, Inc. v. DP Partners, Ltd. P'ship (In re DP Partners, Ltd. P'ship)*, 106 F.3d 667, 673 (5th

Cir. 1997). The Trustee has initiated settlement discussions with Greenberg in an attempt to amicably resolve this dispute.

3. Absent agreement by the parties, the Trustee objects to the Application and requests at this time that the relief sought therein be denied.

WHEREFORE, premises considered, the Trustee respectfully request that the Court deny the relief sought in the Application, and grant the Trustee such other and further relief as the Court deems just.

Respectfully submitted,

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By: /s/ William A. Wood III

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 5, 2010, a true and correct copy of this document was served on all parties on the attached master service list by electronic means as listed on the court's ECF noticing system, by electronic mail as indicated, and/or by United States first class mail, postage prepaid.

/s/ Jason G. Cohen

Jason G. Cohen

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